

ATTACHMENT A

Summary of Proposed FSS Action Plan Policy Changes Effective Upon Board Approval

Chapter	Old Policy Language	New Policy Language	Summary
1-II.C	<p>Single Action Plan [24 CFR 984.201(f)] <u>HACC Policy</u> The PHA is implementing both an HCV FSS program and a public housing FSS program and will submit one action plan, the policies in which apply to both programs.</p>	<p>Single Action Plan [24 CFR 984.201(f)] <u>HACC Policy</u> The PHA is implementing both a public housing and Section 8 FSS program, which may include tenant-based and project-based Section 8, and Foster Youth to Independence Initiative (FYI). The PHA will submit one action plan, the policies in which apply to both programs.</p>	<p>Including the other programs that are under Section 8 that can participate in FSS.</p>
1-II.D.	<p>Contents of the Plan [24 CFR 984.201(d)] <u>HACC Policy</u> None</p>	<p>Contents of the Plan [24 CFR 984.201(d)] HACC Policy</p> <p>The PHA will submit additional optional information in this action plan that will help HUD determine the soundness of the proposed FSS program.</p> <p>This information includes:</p> <p>Policies related to the modification of goals in the ITSP. (Chapter 5)</p> <p>Policies on the circumstances in which an extension of the contract of participation may be granted. (Chapter 5)</p> <p>Policies on the interim disbursement of escrow, including any limitations on the use of the funds. (Chapter 6)</p> <p>Policies regarding eligible uses of forfeited escrow funds by families in good standing. (Chapter 6)</p> <p>Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating. (Chapter 4)</p>	<p>Adding clarity and providing transparency to policies that have been modified.</p>

		<p>Policies on requirements for documentation for goal completion. (Chapter 4)</p> <p>Policies on documentation of the household's designation of the "head of FSS family." (Chapter 4)</p> <p>Policies for providing an FSS selection preference for porting families if the PHA elects to offer such a preference. (Chapter 7)</p>	
1-II.E.	FAMILY DEMOGRAPHICS [24 CFR 984.201 (d)(1)] <u>HACC Policy</u> Existing Demographics	FAMILY DEMOGRAPHICS [24 CFR 984.201 (d)(1)] <u>HACC Policy</u> Updated demographics	Updating current demographics that are participating in both the Section 8 program as well as the public housing program.
2-II.C.	COOPERATIVE AGREEMENTS [24 CFR 984.106] <u>HACC Policy</u> None	COOPERATIVE AGREEMENTS [24 CFR 984.106] <u>HACC Policy</u> The PHA will <u>not</u> enter into a Cooperative Agreement with multifamily-assisted housing owners to voluntarily make its FSS program available to those owner's housing residents.	Specifying that non-public housing residents and non-voucher participants are not able to enroll in HACC's FSS Program.
2-II.D.	ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)] <u>Estimate of Eligible Families</u> 50-75 eligible FSS families can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated federal, tribal, state, local, and private resources.	ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)] <u>Estimate of Eligible Families</u> Per FSS Coordinator, 50-100 eligible FSS families can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated federal, tribal, state, local, and private resources.	Adjusting maximum participant number.
2-II.E.	ELGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS [24 CFR 984.201 (d)(3)] <u>HACC Policy</u> The PHA does not operate other self-sufficiency programs and therefore no additional families from other programs are expected to execute an FSS contract of participation.	ELGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS [24 CFR 984.201 (d)(3)] <u>HACC Policy</u> The PHA operates Resident Opportunity and Self-Sufficiency program in the Public Housing program in which 53 families are	Revised to include HACC's Self-Sufficiency Programs.

		<p>enrolled. Of those families enrolled, 4 are expected to execute an FSS contract of participation.</p> <p>The PHA operates the FYI operating in the Section 8 program in which 24 families are enrolled. Of those families enrolled, 8 are expected to execute an FSS contract of participation.</p>	
2-IV.A.	DEFINITIONS [24 CFR 984.103] <u>HACC Policy</u>	DEFINITIONS [24 CFR 984.103] <u>HACC Policy</u> <p>Benefits means a government benefit of money or monetary value given to an individual by a federal, state, or local government agency for purposes of financial assistance, including but not limited to, Medicaid, supplemental nutritional assistance program benefits and Social Security, Temporary Assistance for Needy Families, and unemployment compensation benefits.</p> <p>Benefits cliff means the sudden and often unexpected decrease in public benefits that can occur with a small increase in earnings. When income increases, families sometimes lose some or all economic supports.</p> <p>Certain interim goals means the family has met all its obligations under the CoP to date, including completion of the ITSP interim goals and tasks to date.</p> <p>Enhance the effectiveness of the FSS program means a demonstrable improvement in the quality of an FSS program in which the enrollment ratio,</p>	Added definitions for terms that were not listed in previous Action Plan.

		<p>escrow balance average, and graduation rate is at or above the national average as measured in HUD's Composite Scores in FR Notice 11/15/18.</p> <p>Other costs related to achieving obligations in the contract of participation means any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP.</p> <p>Supports means, but is not limited to, transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator.</p>	
3-I.C.	FSS PROGRAM COORDINATOR RESPONSIBILITIES <u>HACC Policy</u> None	FSS PROGRAM COORDINATOR RESPONSIBILITIES <u>HACC Policy</u> The PHA will request and provide the rationale to the HUD Field Office to require the FSS Program Coordinator to perform the routine Section 8 or public housing program functions of housing eligibility, lease up, rent calculation, and portability that are funded through Section 8 administrative fees or public housing operating funds.	Added description of FSS Coordinator responsibilities.
3-I.D.	ADMINISTRATIVE FEES AND COSTS Public Housing FSS Program <u>HACC Policy</u> None	ADMINISTRATIVE FEES AND COSTS Public Housing FSS Program <u>HACC Policy</u> The PHA will make funds available from the public housing operating fund to provide	Added to reflect current funding practices.

		<p>administrative costs to the public housing FSS program.</p> <p>The PHA will not make funds available from the Section 8 administrative fees or unrestricted net position to provide administrative costs to the Section 8 FSS program.</p>	
3-I.E.	<p>SUPPORTIVE SERVICES FEES AND COSTS</p> <p>Public Housing FSS Supportive Services</p> <p><u>HACC Policy</u></p> <p>None</p>	<p>SUPPORTIVE SERVICES FEES AND COSTS</p> <p>Public Housing FSS Supportive Services</p> <p><u>HACC Policy</u></p> <p>The PHA will not make funds available from the Section 8 unrestricted net position or public housing operating funds to provide supportive services costs to the FSS program.</p>	Added to reflect current funding practices.
3-I.F.	<p>TREATMENT OF FORFEITED FSS ACCOUNT FUNDS FOR THE BENEFIT OF FSS PARTICIPANTS</p> <p><u>HACC Policy</u></p> <p>None</p>	<p>TREATMENT OF FORFEITED FSS ACCOUNT FUNDS FOR THE BENEFIT OF FSS PARTICIPANTS</p> <p><u>HACC Policy</u></p> <p>The PHA will use forfeited escrow accounts for support and other costs for FSS participants in good standing when funds requested are needed to complete an interim goal or task in the ITSP and are not ongoing expenses or if the family can demonstrate that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals in the ITSP.</p> <p>The PHA will use forfeited escrow accounts for training provided to FSS Coordinators.</p> <p>The PHA will define supports as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to</p>	Added to specify how HACC will utilize forfeited FSS escrow funds.

		<p>achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s)</p> <p>The PHA will define other costs related to achieving obligations in the CoP as any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s).</p> <p>The PHA will define necessary to complete as meaning that no other resources are available in the community either because such a resource is non-existent or that resources are utilized above capacity and agencies cannot, for an indetermined period, provide such a resource.</p> <p>The PHA will provide funds from the forfeited escrow account to FSS participants in good standing before requiring the participant to use an “interim” disbursement from their current escrow account so long as:</p> <p>The funds requested are needed to complete an interim goal or task within the CoP and are not ongoing expenses; or</p> <p>If the family has demonstrated that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals.</p> <p>The PHA will prioritize requests for funds from forfeited escrow accounts initially on a first come first served basis based on the date and time of the request. After that order is</p>	
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		<p>established, while still preserving the first come first served basis, the PHA will apply the following priorities:</p> <p>Priority 1: Funds to meet a goal in the ITSP that is necessary to ensure the safety and wellbeing of victims of domestic violence, dating violence, sexual assault, and stalking as defined in the PHA's Section 8 Administrative Plan and public housing Admissions and Continued Occupancy Policy regarding VAWA.</p> <p>Priority 2: Funds to meet a goal in the ITSP that is necessary to stabilize health, safety, and welfare of the FSS participant or family that if left unattended would jeopardize education, training, or employment.</p> <p>Priority 3: Funds to meet a goal in the ITSP that is necessary to further education, training, and employment goals in the ITSP including childcare, transportation, and medical costs if the lack of any of these prevents completion of the education, training, and employment.</p> <p>Priority 4: Funds to meet a goal in the ITSP that is necessary to further any other goal or tasks.</p>	
3-II.B.	<p>PROGRAM COORDINATING COMMITTEE MEMBERSHIP Required PCC Membership[CFR 984.202(b)(1)] <u>HACC Policy</u> The PHAs representative to the program coordinating committee will be the FSS coordinator(s).</p>	<p>PROGRAM COORDINATING COMMITTEE MEMBERSHIP Required PCC Membership[CFR 984.202(b)(1)] <u>HACC Policy</u> The PHA's representatives to the program coordinating committee will be at least one FSS Program Coordinator and one or more participants from each of the housing programs in which there is an FSS program: Section 8, and public housing.</p>	<p>Added mandatory resident participation.</p>

3-II.C.	PROGRAM COORDINATING COMMITTEE MEMBERSHIP Assistance in Identifying Potential PCC Members [24 CFR 984.202(b)(1)] <u>HACC Policy</u> None	PROGRAM COORDINATING COMMITTEE MEMBERSHIP Assistance in Identifying Potential PCC Members [24 CFR 984.202(b)(1)] <u>HACC Policy</u> The PHA will seek assistance in identifying potential members of the PCC from area-wide, city-wide, and development-based resident councils, the resident management corporation, or the Resident Advisory Board.	New to Action Plan.
4-II.C.	FSS SELECTION PREFERENCES <i>Previous Participation Selection Factor</i> <u>HACC Policy</u> The PHA will not select a family for participation in the FSS program a second time if that family previously participated and did not complete. As always, reasonable accommodation will be considered for an exception.	FSS SELECTION PREFERENCES <i>Previous Participation Selection Factor</i> <u>HACC Policy</u> The PHA will not refuse to select a family for participation in the FSS program a second time if that family previously participated and did not complete.	Revised to allow previous participants a second chance to enroll in FSS.
4-II.D.	SELECTION OF HEAD OF HOUSEHOLD <u>HACC Policy</u> None	SELECTION OF HEAD OF HOUSEHOLD <u>HACC Policy</u> The PHA will meet with the family and detail the obligations, rights, and privileges that pertain to the FSS head of household and require each adult family member to certify their agreement as to their designated head of the FSS family. These certifications will be a permanent part of the FSS family's record and will be updated with each change of head of household.	Added to reflect new regulation that any household member can participate in FSS. Limit one member per household.
5-I.C.	FAMILY OBLIGATIONS Compliance with Lease Terms [24 CFR 984.303(b)(3)] <u>HACC Policy</u>	FAMILY OBLIGATIONS Compliance with Lease Terms [24 CFR 984.303(b)(3)] <u>HACC Policy</u>	Revised policy regarding termination of CoP in regards to complying with lease terms.

	The PHA's FSS program will terminated the FSS contract of participation for failure to comply with the terms of the lease.	The PHA's FSS program will not terminated the FSS contract of participation for failure to comply with the terms of the lease.	
5-II.C.	<p>MODIFICATION OF THE CONTRACT <u>HACC Policy</u></p> <p>When modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency.</p> <p>When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, , designate another family member to be the FSS head of household and receive escrow funds.</p> <p>When an FSS family moves to the jurisdiction of a receiving PHA that does not have an FSS program and the family may not continue participation in the FSS program, and modification of the FSS contract will allow the family to complete the contract and receive an escrow disbursement or terminate the contract with escrow disbursement.</p>	<p>MODIFICATION OF THE CONTRACT <u>HACC Policy</u></p> <p>When modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self- sufficiency.</p> <p>When the actual end date of the CoP is determined by the effective date of the FSS family's first reexamination changes the end date of the CoP.</p> <p>When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, , designate another family member to be the FSS head of household and receive escrow funds.</p> <p>When an FSS family moves to the jurisdiction of a receiving PHA that does not have an FSS program and the family may not continue participation in the FSS program, and modification of the FSS contract will allow the family to complete the contract and receive an escrow disbursement or terminate the contract with escrow disbursement.</p>	Added paragraph 2 – actual end date won't be known at time of FSS enrollment.
5-II.E.	<p>TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE <u>HACC Policy</u></p> <p>The PHA will not continue to offer supportive services to a former FSS family who has completed its contract of participation, and whose head of family is employed.</p>	<p>TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE <u>HACC Policy</u></p> <p>The PHA will continue to offer supportive services to a former FSS family who has completed its contract of participation.</p>	Some supportive services will be available after FSS graduation (i.e. IDA account disbursement).

7-I.C.	RESIDENCY REQUIREMENTS <u>HACC Policy</u> The PHA will not approve a family’s request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation.	RESIDENCY REQUIREMENTS <u>HACC Policy</u> The PHA will consider a family’s request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation if the move is in accordance with the regulations for such moves at 24 CFR 982.353.	Revised “will not approve” to HACC “will consider”.
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